REMARKS

Claims 1-20 are pending. By this Amendment, claims 1, 7, 13 and 15 are amended and claims 12 and 20 are cancelled.

Independent claims 1 and 15 have been amended in response to Examiner's rejection under 35 U.S.C. § 102. Dependent claim 13 has been amended to reflect the cancellation of base claim 12. Dependent claim 7 has also been amended.

Claim Rejections – 35 U.S.C. § 112

Claims 12-14, 16 and 20 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. In particular, the Office Action indicated that in claim 12 the term "'the server' is vague and indefinite because the server recited in claim 1 has already been defined as a CTI server," and that further confusion results because the server of claim 1 "is already connected to one or more private automatic branch exchanges by a computer link through at least one interface."

Claim 12 has been cancelled and claim 13 amended to indicate its dependence on claim 1 rather than claim 12. Since claim 1 points out and distinctly claims a CTI server, Applicant submits that claim 13 as amended is allowable. Similarly, because claim 13 as amended points out and distinctly claims a CTI server through independent claim 1, claim 14 which depends on claim 13, is also allowable.

The Office Action also indicates that claims 16 and 20 "basically have identical limitations." Claim 20 has been cancelled, making claim 16 allowable.

Accordingly, Applicant respectfully requests that the § 112, second paragraph, rejection of claims 13-14 and 16 be withdrawn.

7

Claim Rejections – 35 U.S.C. § 102

Claims 1-20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,141,545 to Begeja et al. (hereinafter "Begeja"). Applicant has amended claims 1 and 15 to indicate that the computer link of the present invention is a TCP/IP link, that the server drives the interfaces, and that the interfaces are adapted for operable connection to the server when the server is located remotely. Claims 2-14 depend on claim 1. Claims 16-20 depend on claim 15.

The Office Action indicates that the claimed CTI server of claims 1, 7, 12, 15, and 18, reads on Begeja's TERMINAL SERVER 110 and that the claimed interfaces of these claims read on Begeja's MODEM 111. The Office Action also indicates that Begeja "plainly teaches the claimed function of sending/converting control signals corresponding to service requests to drive the PBX 101."

With respect to claim 1, even if the claimed CTI server does read on Begeja's TERMINAL SERVER 110 and the claimed interfaces of the present invention do read on Begeja's MODEM 111, Begeja does not teach or suggest "one or more interfaces connected to telephone lines of the automatic branch exchanges by a TCP/IP computer link to the server."

Begeja does teach sending information from a database to a terminal server over a corporate TCP/IP WAN (see, e.g., column 4, lines 47-52), but Begeja does not teach a TCP/IP link between an interface or modem and a server. At column 4, lines 53-57, Begeja discloses "The terminal server 110 receives the message, performs a protocol conversion to the command signals that need to be inputted to the PBX 101, and sends these commands, together with any necessary translation commands, to a modem 111 that is actually connected to PBX 101." According to Begeja column 4, lines 25-29 "the message" includes information on "the particular type of PBX equipment associated with that subscriber, and the procedures or signals

required by that PBX...." As such, the invention disclosed in Begeja performs a protocol conversion to suit the connection requirements of the PBX. Therefore, Begeja cannot teach a TCP/IP computer link to the server because the invention in Begeja requires that the link change protocols to accommodate different types of PBXs. Conversely, the present invention discloses a TCP/IP computer link to a CTI server independent of the protocol requirements of the various types of PBXs that could be connected to the interface.

Furthermore, Begeja fails to teach an interface that is "adapted for operable connection to the CTI server when the CTI server is located in a remote location" as disclosed in the newly amended claim 1. In fact, at column 5, lines 1-3, Begaja teaches away from the use of a remote server, and the use of a TCP/IP link by disclosing that the "the terminal server-modem could be an intelligent platform that could have more control of the PBX 101." By suggesting the creation of an intelligent platform with more control, Begeja teaches away from a server that would have less control, be located remotely, and rely on a TCP/IP connection to an interface with greater control. Thus, the amended Claim 1 is not anticipated by Begeja.

Based on the amendment to claim 1, and for the reasons above, Applicant submits that claim 1 is allowable. Claims 2-11 and 13-14 depend from claim 1 and are therefore also allowable. The rejections of claims 2-11 and 13-14 are traversed but not expressly argued herein in view of the allowability of the underlying base claim. Applicant respectfully requests that the rejection to claims 1-11 and 13-14 be withdrawn and the claims allowed.

Applicant has similarly amended claim 15 to clarify that the computer link is a TCP/IP link, therefore Applicant's arguments above equally apply to claim 15. Thus, the amended claim 15 is not anticipated by Begeja. Claims 16-19 depend from claim 15 and are therefore also allowable. The rejections of claims 16-19 are traversed but not expressly argued herein in view of the allowability of the underlying base claim. Applicant respectfully requests that the rejection to claims 15-19 be withdrawn and the claims allowed.
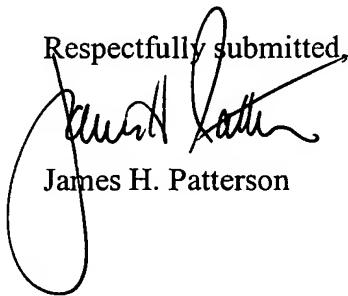
9

CONCLUSION

In view of the foregoing, it is submitted that this application is in condition for allowance.

Favorable consideration and prompt allowance of the application are respectfully requested.

The Examiner is invited to telephone the undersigned if the Examiner believes it would

be useful to advance prosecution.

Respectfully submitted,

James H. Patterson

Registration No. 30,673
Customer No. 24113
Patterson, Thuente, Skaar & Christensen, P.A.
4800 IDS Center
80 South 8th Street
Minneapolis, Minnesota 55402-2100
Telephone: (612) 349-5741